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**FILED**

**MAY 04 2018**

Clerk, U.S. District Court  
District Of Montana  
Great Falls

**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**MAURICE JOSEPH FREGIA,  
CHAD ALLEN BERES,  
CHRISTOPHER SCOTT HURST,  
and LARRY BENJAMIN  
BARNETT,**

**Defendants.**

**CR 18- 58 -BLG- SPW**

**INDICTMENT**

**CONSPIRACY TO POSSESS WITH  
INTENT TO DISTRIBUTE  
METHAMPHETAMINE**

**(Count I)**

**Title 21 U.S.C. § 846**

**(Penalty: Mandatory minimum ten years to  
life imprisonment, \$10,000,000 fine, and at  
least five years supervised release)**

**POSSESSION WITH INTENT TO  
DISTRIBUTE METHAMPHETAMINE**

**(Count II)**

**Title 21 U.S.C. § 841(a)(1)**

**Title 18 U.S.C. § 2**

**(Penalty: Mandatory minimum ten years to  
life imprisonment, \$10,000,000 fine, and at  
least five years supervised release)**

	<p><b>POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME</b> <b>(Count III)</b> <b>Title 18 U.S.C. § 924(c)(1)(A)(i)</b> <b>(Penalty: Mandatory minimum five years to life imprisonment, consecutive to any other sentence, \$250,000 fine, and five years supervised release)</b></p> <p><b>CRIMINAL FORFEITURE</b> <b>Title 21 U.S.C. § 853(a)(1) and (2)</b> <b>Title 18 U.S.C. § 924(d)</b></p> <p><b>TITLE 21 PENALTIES MAY BE ENHANCED BY PRIOR DRUG-RELATED FELONY CONVICTIONS</b></p>
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THE GRAND JURY CHARGES:

COUNT I

That beginning in approximately September of 2017, and continuing until on or about April 11, 2018, at Billings and within Yellowstone County, in the State and District of Montana and elsewhere, the defendants, MAURICE JOSEPH FREGIA, CHAD ALLEN BERES, CHRISTOPHER SCOTT HURST, and LARRY BENJAMIN BARNETT, knowingly and unlawfully conspired and agreed with other persons, known and unknown to the Grand Jury, to possess with the intent to distribute, in violation of 21 U.S.C. § 841(a)(1), 500 grams or more of a substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 846.

## COUNT II

That beginning in approximately September of 2017, and continuing until on or about April 11, 2018, at Billings and within Yellowstone County, in the State and District of Montana and elsewhere, the defendants, MAURICE JOSEPH FREGIA, CHAD ALLEN BERES, CHRISTOPHER SCOTT HURST, and LARRY BENJAMIN BARNETT, knowingly possessed, with the intent to distribute, 500 grams or more of a substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet in the same, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

## COUNT III

That beginning in approximately September of 2017, and continuing until on or about April 11, 2018, at Billings and within Yellowstone County, in the State and District of Montana and elsewhere, the defendants, MAURICE JOSEPH FREGIA, CHAD ALLEN BERES, CHRISTOPHER SCOTT HURST, and LARRY BENJAMIN BARNETT, knowingly possessed firearms in furtherance of drug trafficking crimes that may be prosecuted in a court of the United States, namely conspiracy to possess with intent to distribute methamphetamine, and possession with intent to distribute methamphetamine, as alleged in counts I and II above, in violation of 18 U.S.C. § 924(c)(1)(A)(i).

### FORFEITURE ALLEGATION

Upon conviction of any offense set forth in counts I or II of this indictment, the defendants, MAURICE JOSEPH FREGIA, CHAD ALLEN BERES, CHRISTOPHER SCOTT HURST, and LARRY BENJAMIN BARNETT, pursuant to 21 U.S.C. § 853(a)(1) and (2), shall forfeit to the United States any property constituting or derived from any proceeds obtained directly or indirectly as a result of the violations alleged in either count and any property used or intended to be used in any manner or part to commit or to facilitate the commission of the offenses charged in either count, including:

- \$14,538.00 in United States currency found at XXX Broadwater Avenue;
- \$1,488.00 in United States currency found on Hurst;
- A Rolex Watch S/N 18000-3055 found at XXX Broadwater Avenue;
- A Highline Custom Jewelry Men's Ring found at XXX Broadwater Avenue; and
- Various firearms and ammunition found at XXX Broadwater Avenue and XXXX Rosebud Drive.

Upon conviction of the offense set forth in count III of this indictment, the defendants, MAURICE JOSEPH FREGIA, CHAD ALLEN BERES, CHRISTOPHER SCOTT HURST, and LARRY BENJAMIN BARNETT, pursuant

to 18 U.S.C. § 924(d), shall forfeit any firearm involved in and used in a knowing violation of the offense charged in count III, including the firearms and ammunition found at XXX Broadwater Avenue and XXXX Rosebud Drive.

The United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), if any of the property that constitutes or is derived from the proceeds traceable to the offenses set forth in counts I and II:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

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FOREPERSON

  
KURT G. ALME  
United States Attorney

  
JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney

Crim. Summons \_\_\_\_\_  
Warrant: ☒ \_\_\_\_\_  
Bell: \_\_\_\_\_